

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Case No. 22-mc-\_\_\_\_\_

Plaintiff,

v.

\$116,830.00 IN U.S. CURRENCY,

**STIPULATION TO EXTEND  
TIME TO COMMENCE  
JUDICIAL FORFEITURE  
PROCEEDINGS**

Defendant,

and

ABDINASIR SALEH ABUBKER,

Claimant.

The Plaintiff and the Claimant stipulate, pursuant to 18 U.S.C. § 983(a)(3)(A), to extend the time in which the Plaintiff is required to file a Complaint for Forfeiture or to obtain an Indictment alleging forfeiture until May 31, 2022.

1. On or about October 8, 2020, the Ramsey County Sheriff's Office and the St. Paul Police Department seized \$116,830.00 in U.S. Currency from the Claimant. Custody of the matter was transferred to the U.S. Department of Homeland Security ("HSI").

2. HSI commenced administrative forfeiture proceedings for the Defendant Currency and sent written notice to all known interested parties of its intent to forfeit the currency.

3. On December 29, 2021, Abdinasir Saleh Abubker filed a claim for the Defendant Currency through his attorney, Jennifer Speas.

4. The time has expired for any other person to file a claim for the Defendant Currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no other claims for any portion of the currency have been received from any other individual or entity.

5. Under 18 U.S.C. § 983(a)(3)(A), the government has 90 days after a claim has been filed in an administrative action to bring a civil complaint for forfeiture, “except that a court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties.”

6. The parties agree to extend the deadline under 18 U.S.C. § 983(a)(3) for filing a judicial forfeiture proceeding with respect to the Defendant Currency until May 31, 2022, in order to allow time for settlement discussions.

Dated: March 21, 2022

CHARLES J. KOVATS, JR.  
Acting United States Attorney

*s/ Quinn Hochhalter*  
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Date: March 21, 2022

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Abdinasir Saleh Abubker